



World Tax Advisor

A world of news with tax@hand.

The 21 December issue of *World Tax Advisor* is the final issue for 2018. The next issue will be 11 January 2019.

Saudi Arabia releases draft transfer pricing regulations

The rules would introduce new compliance obligations, including a transfer pricing disclosure form that would need to be filed within 120 days of the end of the accounting period.



Belgium

Transfer pricing documentation deadline extended



Cambodia

2019 tax law changes would distinguish between legal and "physical" persons



The deadlines for filing the master and local file forms for assessment year 2018 and CbC notifications related to assessment year 2019 are extended to 28 February 2019.

Separate rules would apply to legal persons and partnerships and sole proprietorships.



Cyprus

CbC reporting deadline extended

The submission deadline for CbC reports for the 2017 reporting fiscal year has been extended to 31 January 2019.



European Union

CJEU rules German RETT intragroup exemption in line with EU state aid rules

The court has concluded that the intragroup restructuring exemption is not a selective measure and, thus, does not constitute state aid.



Finland

Final interest deduction limitation rules include changes to group ratio rule

Changes have been made to the balance sheet comparison in the group ratio rule and a definition is provided for the grandfather clause.



Greece

Capital tax exemption introduced for capital investments in R&D

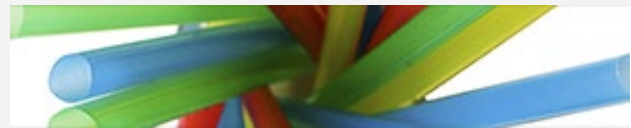
The incentive aims to enhance investment in R&D, but with the ultimate goal of helping to mitigate the domestic financial crisis.



Italy

Tax amnesty introduced for taxpayers to settle their tax positions

The amnesty covers various situations, and taxpayers may be able



Malta

EU ATAD implemented into domestic law

The new rules will apply as from 1 January 2019, with the exception of

to avoid penalties and interest or pay tax in installments.

the rules relating to exit taxation, which will apply as from 1 January 2020.



Netherlands

New income thresholds for highly skilled migrants

The applicable salary levels for HSMs will increase as from 1 January 2019.



Sweden

New precedent on taxation of stock options

The supreme court has held that Sweden's different tax treatment of stock options between residents and nonresidents violates EU free movement of persons.

Tax treaty round up

Tax treaty developments in Argentina, China, Croatia, Finland, Hong Kong, India, Indonesia, Malta, Portugal, Romania, Spain and Turkey.

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Have a question?

If you have any questions about the content in *World Tax Advisor*, please email Susan Lyons at slyons@deloitte.com or Sally Clurman at sclurman@deloitte.com.

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